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Agency Secretary

Air Resources Board

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Gray Davis
Governor

April 2, 2002

Dear Enhanced Vapor Recovery Stakeholders:

The Enhanced Vapor Recovery (EVR) technology review staff report is now available for review and comment. The report summarizes the technological feasibility of EVR standards based on information from manufacturers, test results from vapor recovery equipment and pilot In-Station Diagnostic (ISD) system testing, performance and cost-effectiveness estimates for the technology-forcing components of the proposed EVR specifications and requirements, and written comments from manufacturers and stakeholders.

Section V of the technology review staff report contains the conclusions and recommendations that staff will present to the Board at a public meeting, currently scheduled for September 2002. Specific regulatory language changes will be discussed at a workshop to solicit stakeholder input. The workshop is tentatively scheduled for June 18, 2002. We would appreciate receiving your comments on the technology review by May 1, 2002, to allow consideration before the workshop.

Electronic copies of the staff report can be found at <http://arb.ca.gov/vapor/vapor.htm>. Alternatively, paper copies may be obtained from the Engineering and Certification Branch by calling (916) 327-0900.

If you are a person with a disability and desire to obtain this document in an alternative format, please contact our Americans with Disabilities Act Coordinator at (916) 323-4916, or TDD (916) 324-9531, or (800) 700-8326 for TDD calls from outside the Sacramento area.

In addition, we would like to clarify our policy regarding Phase II and ISD certification.

Vapor recovery system and ISD manufacturers have expressed concern that if a Phase II vapor recovery system (VRS) and an ISD system jointly apply for certification, and the ISD system fails during certification testing, that the Phase II VRS certification test will be at risk to be terminated. We have determined that if the ISD system fails during the certification period, the Phase II VRS may continue certification testing. However, the Phase II VRS may only be used at facilities qualifying for an ISD exemption.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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For Phase II systems which are certified with ISD, CARB has determined that the ISD system can be removed from the Phase II VRS when the Phase II VRS is installed on a Gasoline Dispensing Facility (GDF) with a throughput that is exempt from the ISD requirement. However, the applicant must demonstrate during certification that the ISD system does not interact with the performance of the Phase II VRS.

Equipment manufacturers and stakeholders have suggested that partial ISD systems be considered for certification. Partial ISD systems were invited to participate in the technology review; however, ISD systems considered for certification must meet all Certification Procedure 201 (CP-201) Appendix requirements. Manual monitoring procedures will not be acceptable as a certified ISD system since an automated ISD system has been proven technologically feasible.

If you have questions or need further information, please contact Cindy Castronovo at (916) 322-8957 or via e-mail at ccastron@arb.ca.gov, or Joe Guerrero at (916) 324-9487 or via e-mail at jguerrer@arb.ca.gov.

Sincerely,

William V. Loscutoff, Chief
Monitoring and Laboratory Division

cc: Doug Quetin, Monterey Bay Unified APCD
Rosa Salcedo, San Diego County APCD